

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
STAR AUTO SALES OF QUEENS LLC
d/b/a STAR SUBARU,

Case No.: 1:19-cv-06791 (RPK) (ST)

Plaintiff,

-against-

HANIE ISKANDER, a/k/a “John Alexander”
AND NAGWA YOUSEIF a/k/a “Nagwa F Youseif”,

Defendants.
-----X

**DECLARATION OF JAMIE S.
FELSEN, ESQ. IN SUPPORT OF
PLAINTIFF’S MOTION TO
AMEND ITS COMPLAINT**

Jamie S. Felsen, Esq., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am admitted to practice before this Court and am a member of Milman Labuda Law Group PLLC, attorneys for the Plaintiff, Star Auto Sales of Queens LLC d/b/a Star Subaru (hereinafter “Plaintiff” or “Star Subaru”), in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the file maintained by this office.

3. I make this declaration in support of Plaintiff’s motion to amend the complaint following the Court’s recent dismissal of some its claims against Defendants Hanie Iskander a/k/a John Alexander (“Alexander”) and Nagwa Youseif a/k/a Nagwa F. Youseif (“Youseif”) for fraud and deceit, aiding and abetting of fraud, civil conspiracy of fraud, unjust enrichment, aiding and abetting breach of fiduciary duty, conversion, civil conspiracy of conversion, breach of contract, and constructive trust.

4. Annexed hereto as **Exhibit A** is a true and correct copy of the Proposed Amended Complaint.

5. Annexed hereto as **Exhibit B** is a true and correct copy of the Proposed Amended Complaint with track changes.

6. No previous application for the relief herein prayed for has been made in this Court.

Executed on April 13, 2021.

/s
Jamie S. Felsen, Esq.